

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**FRANKIE WILLIAMS, KIMBERLY ORD
and MATTHEW DEVINE, on their own
behalf and for all others similarly situated,**

Plaintiffs,

v.

SECURITAS SECURITY SERVICES USA INC.:

Defendant.

Civil Action No. 10-cv-07181

Hon. Harvey Bartle, III

STIPULATION RE: SUBMISSION OF NOTICE

WHEREAS, by Order dated August 17, 2011 (Doc. No. 45), the Court granted in part and denied in part Plaintiffs' Motion for Conditional Certification;

WHEREAS, the Court's August 17, 2011 Order directed the Parties to jointly submit for Court approval a form of notice to be distributed to all of defendant's Pennsylvania employees describing their right to participate in this collective action by August 30, 2011;

WHEREAS, on August 25, 2011, Plaintiffs filed a Motion for Reconsideration of the Court's August 17, 2011 Order, and Defendant is preparing an opposition to this filing; and

WHEREAS, in order to conserve the resources of the Parties and the Court, the Parties desire to postpone submitting a proposed form of Notice until after the Court resolves Plaintiffs' Motion for Reconsideration;

NOW THEREFORE, the Parties stipulate that they will meet and confer and file a Proposed Notice with the Court within 14 days of the Court's Order ruling on Plaintiffs' Motion for Reconsideration, and respectfully request the Court to so order:

Dated: August 29, 2011

By: /s/ David J. Cohen
David J. Cohen, Esq.

By: /s/ Martha Keon
Martha Keon, Esq.

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Counsel for Defendant

IT IS SO ORDERED:

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HON. HARVEY BARTLE, III